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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 FREEDOM MORTGAGE CORPORATION,  
10 a New Jersey Corporation,

Case No.: 2:19-cv-1411 -APG-DJA

11 Plaintiff,  
12 vs.

13 JAMES S. KENT, as Trustee of the 6221 RED  
14 PINE TRUST, a Nevada Trust; JAMES B.C.  
NELSON, an Individual; TORREY PINES  
ESTATES HOMEOWNERS ASSOCIATION, a  
Nevada nonprofit corporation; Nevada DOE  
15 DEFENDANTS I through X; ROE  
CORPORATIONS I through X,

**STIPULATION AND ORDER TO  
DISMISS TORREY PINES ESTATES  
HOMEOWNERS ASSOCIATION**

16 Defendants.

17 Plaintiff, FREEDOM MORTGAGE CORPORATION ("Freedom"), by and through its  
18 attorneys of record, the law firm of Gerrard Cox Larsen and Defendant TORREY PINES  
19 ESTATES HOMEOWNERS ASSOCIATION ("Torrey Pines"), by and through its counsel of  
20 record, Maddox, Isaacson & Cisneros, LLP hereby agree and stipulate as follows:  
21

22 **IT IS HEREBY STIPULATED** that Defendant Torrey Pines is dismissed with prejudice as  
to all claims made by Plaintiff Freedom.  
23

24 **IT IS FURTHER STIPULATED** that Defendant Torrey Pines disclaims any claim or  
interest in that certain real property located at 6221 Red Pine Ct., Las Vegas, Nevada 89130 APN  
25 No. 125-26-111-028 ("Property").  
26

27 **IT IS FURTHER STIPULATED** that Torrey Pines shall maintain any and all rights to  
enforce the governing documents (Declaration, Bylaws, Rules & Regulations, etc.), and provisions  
28 of Nevada law against the home. This would include, but is not limited to, architectural

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1 enforcement, the collection of assessments and foreclosure for any future nonpayment of  
2 assessments.

3 **IT IS FURTHER STIPULATED** that any Subpoenas for the production of documents  
4 and/or deposition of witnesses which is directed to Torrey Pines in this litigation may be served by  
5 delivering a copy to Maddox, Isaacson & Cisneros, LLP without need for a process server.

6 **IT IS FURTHER STIPULATED** that Torrey Pines and Freedom will bear their own  
7 attorneys' fees and costs in conjunction with the above-referenced litigation

8 **IT IS SO STIPULATED.**

9 Dated this 14<sup>th</sup> day of October, 2019.

10 **GERRARD COX LARSEN**



11  
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18 *Attorneys for Freedom  
Mortgage Corporation*

Dated this 11<sup>th</sup> day of October, 2019.

19 **MADDOX, ISAACSON &  
CISNEROS, LLP**



20 Troy L. Isaacson, Esq.  
21 Nevada Bar No. 6690  
22 11920 Southern Highlands Pkwy., Ste. 100  
23 Las Vegas, NV 89141  
24 *Attorneys for Torrey Pines Estates  
Homeowners Association*

25 **IT IS SO ORDERED.**

26 Respectfully submitted by:

27 **GERRARD COX LARSEN**



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34 *Attorneys for Plaintiff Nationstar Mortgage*

35   
36 UNITED STATES DISTRICT JUDGE  
37 Dated: October 15, 2019.